

Confidential-Attorney/Client Communication

Company Name: Noranda Aluminum, Inc., New Madrid, MO

EPA ID Number: MOD093750966

Inspectors Name: Dedriel Newsome *DNW*

Date: 8/20/98

Noranda faxed a copy of their NOV response on 8/19/98. Don Backfisch stated the original will be following in the mail. According to the NOV response, these are preliminary actions and as more details are added more information will be sent to EPA. I have the following comments on the attached initial response:

Violation #	Comments
1	If they will no longer crush in the building, then where will they crush or where will they send the K088 waste
2	What about ventilation when workers or handling the K088 waste
3	PPE is listed so do not have to be tested, unless handling as debris and testing after cleaning???
4	Photos would be helpful
5	Also, were not labeled as "Hazardous Waste"
6	During the inspection, I specifically asked Mr. Backfisch whether they could reuse the thinner since it was the same type they currently use. He stated that he did not know. I asked what he intended to do with what was in the Hazardous Waste Storage Building and he stated dispose of it, therefore I cited this.
7	They are numbered consecutively, but they are not used in a consecutive order. I am not sure if he is saying that they will now start using them in this order.
8	—
9	—
10	How soon is as soon as training schedules permits
11	—
12	When will they receive them and what are they doing until then
13	Needs more detail
14	—

723  
Withheld from FOIA  
response



R00117973  
RCRA RECORDS CENTER

P.O. Box 70  
New Madrid, MO 63869-0070  
(573) 643-2361 Ext. 2126  
Fax (573) 643-6721

**Noranda Aluminum, Inc.**

# Fax

**To:** Dedriel Newsome

**From:** Don Backfisch

**Fax:** (913) 551-5287

**Pages:** 4

**Phone:** (913) 551-5058

**Date:** 08/19/98

**Re:** Response to August Inspection **CC:**

☐ **Urgent**   ☐ **For Review**   ☐ **Please Comment**   ☐ **Please Reply**   ☐ **Please Recycle**

● **Comments:**

Attached is the preliminary response to the violations noted for the August 5 & 6 inspection at our plant in New Madrid. The original will follow by certified mail.

Noranda Aluminum, Inc.  
P.O. Box 70  
New Madrid, Missouri 63869  
(573) 643-2361

**noranda**

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August 19, 1998

**CERTIFIED MAIL # P 162 691 325**

U.S. Environmental Protection Agency, Region VII  
25 Funston Road  
Kansas City, KS 66115  
Attn: Dedriel Newsome

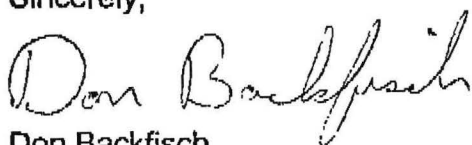
RE: RCRA INSPECTION AT NORANDA ALUMINUM, INC.

Dear Ms. Newsome:

Attached is a table of the violations listed from the inspection of our facility on August 5 and 6, 1998. The second column is the action that is planned (or has already been carried out) to address each of these issues. These are just preliminary action plans. As more details are added to the action plans, updated information will be sent to the appropriate personnel at your office.

If you have any questions or need additional information, please call Dave Hart or me at (573) 643-2361.

Sincerely,



Don Backfisch  
Environmental Superintendent

DB:cw  
Enclosure

CC: D. Hart

**Noranda Aluminum  
Preliminary Action Plan  
August 18, 1998**

#	Citation	Action Planned
1	Treating K088 waste by crushing without a permit Sec 260.390(1) RSMO	Noranda has a project in place and budget approved to install a crusher and upgrade the K088 building to meet 40 CFR 265.1100 standards by May 1999. The building will no longer be used for crushing until the building meets the standard.
2	Failure to operate and maintain K088 building to minimize possible releases of K088 waste 10CSR 25-5.262(1) incorporating 262.34(a)(4) referencing 40CFR 265.31	Doors will be kept closed and floors swept beginning immediately.
3	Make a hazardous waste determinations on Aerosol cans, maintenance grinding residue, paint waste in haz waste storage building, and spent PPE in K088 building 10CSR 25-5.262(1) incorporating 40CFR 262.11	Determinations will be initiated for all items by 8/31/98.
4	Failure to clean up oil spill at emulsion tanks and hydraulic tanks 10CSR 25-11.279(1) incorporating 40CFR 279.22(d)	Cleanup of the spill areas at the waste emulsion oil storage tanks and the hydraulic tanks has been completed.
5	Failure to DOT label five one-gallon cans of paint thinner in the haz waste building 10CSR 25-5.262(2)(c)(1)	Upon further inspection 4 of 5 of the containers were found to be in their original shipping carton complete with required DOT labels.
6	Failure to date five one-gallon cans of paint thinner in the haz waste building 10 CSR 25-5.262(1) incorporating 40CFR 262.34(a)(2)	Material was being stored for safe keeping and has been returned to the maintenance department for use.

**Noranda Aluminum  
Preliminary Action Plan  
August 18, 1998**

7	Manifests not using consecutive numbers 10 CSR 25-5.262(2)(B)(2)(A)	Manifests are numbered with unique, consecutive numbers.
8	K088 building not inspected daily when K088 is handled 10 CSR 25-5.262(2)(C)(11)	A form will be developed by 8/24/98 for recording the daily inspection of the building used handling K088.
9	No job description for pot service material handlers 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1&2)	Job descriptions will be updated by 9/30/98. This requires review by a joint union/management committee outlined in the labor agreement.
10	No RCRA training since 1990 including contingency plan review 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3)	8 hour Awareness Level and 4 hours Incident Command will be scheduled for all employees who handle hazardous waste as soon a training schedules permit.
11	Names and job titles not current. 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1&2)	Names and job titles will be updated by 8/31/98 and procedures developed to insure they remain current.
12	No communicating device in K088 potlining building 10 CSR 25-5.262(1) incorporating 40 CFR 262.34 (a)(4) referencing 40 CFR 265.34(a)	A two-way radio for use by employees assigned to the K088 building has been purchased.
13	Storing wastes over 90 days Sec 260.390(1) RSMO	Requirements for proper waste storage have been reviewed.
14	Contingency plan does not include procedure for clean up of K088 spill.	The Plan will be modified by 8/31/98 to include a K088 spill clean up procedure.



## MEMORANDUM

From: Brian Mitchell  
ARTD/RESP  
U.S. EPA Region VII  
901 North 5<sup>th</sup> Street  
Kansas City, Kansas 66101

To: Noranda Aluminum, Inc.  
MOD093750966

Date: September 15, 1999

On September 15, 1999, I spoke with Don Backfisch. He provided me with the following information:

1. Noranda never had a PE Certification meeting the requirements of 40 CFR 265 Subpart DD.
2. Noranda is in not using the building as a containment building but is in the process of upgrading the building to meet 40 CFR 265 Subpart DD requirements.
3. Noranda has not tested its potliners within the past 4 years to see if it meets current LDR requirements.
4. Noranda has, since the last inspection, been handling personal protective equipment as K088 hazardous waste.

Withheld from FOIA  
response